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3 **UNITED STATES DISTRICT COURT**
4 **FOR THE SOUTHERN DISTRICT OF TEXAS**
5 **HOUSTON DIVISION**
6

7 JAMES B. GOODMAN,
8 Plaintiff,

9 vs.

10 CORSAIR COMPONENT INC.
11 Defendant.
12

Civil Action No. 4:14-CV-01381 LNH

**Before U.S. District Court Judge
LYNN N. HUGHES**

JURY TRIAL DEMANDED

13 **PLAINTIFF'S SUBMITS HIS NARRATIVE OF THE PATENT**

14 The Order dated September 9, 2014 requires the Plaintiff to provide a one-page narrative
15 of its patent to the Defendant. The required one-page narrative from the Plaintiff is at the second
16 page of this document.
17

18 It is true that U.S. Patent No. 6,243,315 ("the '315 Patent) is being sued on by the
19 Plaintiff, but it is only Claim 1 of the '315 Patent which is being enforced. The specification and
20 claims in the '315 Patent cover many inventions so that the narrative of the '315 Patent for this
21 case is assumed to be a narrative of the invention set forth in Claim 1 of the '315 Patent.
22

23 The importance of claim construction by the Court has been pointed out by the U.S.
24 Supreme Court and the Federal Court; and is part of the Local Rules for this Court. See L.R. 1-
25 2(c); 2-1; 2-5(b)(1); 3-6(b); and particularly 4.
26

27 Thus, the narrative being provided is not intended to be a substitute for a claim
28 construction of the asserted Claim 1, and Plaintiff respectfully reserves the right to submit a
proposed claim construction.

1 Plaintiff's narrative of Claim 1 of the '315 Patent is being presented as a narrative on the
2 various portions making up Claim 1:

3
4 U.S. PATENT NO. 6,243,315

5 Claim 1. A memory system for use in a
6 computer system, said memory system
comprising:

7 a plurality of volatile solid state memory
8 devices that retain information when an
9 electrical power source is applied to said
10 memory devices within a predetermined
11 voltage range and capable of being placed in
a self refresh mode; said memory devices
having address lines and control lines;

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14 a control device for selectively electrically
15 isolating said memory devices from
16 respective address lines and respective
17 control lines so that when said memory
18 devices are electrically isolated, any signals
19 received on said respective address lines and
respective control lines do not reach said
memory devices; and

20 a memory access enable control device
21 coupled to said control device and to said
22 control lines for determining when said
23 memory system is not being accessed and

24 for initiating a low power mode for said
25 memory system wherein said control device
26 electrically isolates said memory devices and
27 places said memory devices in said self
28 refresh mode, thereby reducing the amount
of electrical energy being drawn from an
electrical power supply for said computer
system.

Generally, the invention is for a memory
system for use in a computer system.

The memory system has at least two volatile
memory devices (or the equivalent) which
retain memory when a voltage in a
predetermined range is applied. In addition,
each memory device has address and control
lines used for adding information or reading
information from the memory devices. Each
of the memory devices has a self refresh
mode so the information will not degrade
beyond the point of being readable.

A control device is capable of doing the
equivalent of "disconnecting" the address
lines and control lines so signals on the
address and control lines do not effectively
reach the memory devices. This feature
prevents "electrical noise" from reaching the
memory devices.

A memory access control device monitors
the memory system to determine when the
memory system is not being accessed. This
information is communicated to the control
device.

The memory access control device initiates a
low power mode to cause the control device
to isolate the memory devices and initiate
self refresh when the memory system is not
being accessed. The low power mod
reduces the power demands of the memory
device. Hence, the claimed invention saves
power, and is very important.

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Respectfully submitted,

/s/ David Fink

David Fink

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Attorney in Charge for the Plaintiff

1 **CERTIFICATE OF SERVICE**

2 I certify that a copy of this document was served on all attorneys of record through the
3
4 Court's CM/ECF electronic system on September 15, 2014.

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6 Date: September 15, 2014

7 By /s/ David Fink
8 David Fink
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